

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**BOARDS OF TRUSTEES OF THE
CEMENT MASONS & PLASTERERS
HEALTH & WELFARE TRUST, *et al.*,**

Plaintiffs,

V.

KELAYE CONCRETE LLC, a
Washington limited liability company,
UBI No. 603213162, Contractor's
License No. KELAYCL876K2,

Defendant.

NO. 2:15-cv-01866-RAJ

PLAINTIFF TRUSTS' RESPONSE TO ORDER TO SHOW CAUSE

Plaintiffs Boards of Trustees provides this response to the Court's Show Cause Order at Dkt.3.

The plaintiffs served the employer, Kelaye Concrete, LLC (“Kelaye”), on December 4, 2015 (*see* Dkt. No 4). The plaintiffs have not sought a default because that they have been trying to work with Kelaye and its attorney to resolve this case. See Exhibit A to the Declaration of Noelle Dwarzski.

**RESPONSE TO ORDER TO SHOW CAUSE –
Cause No. 2:15-cv-01866-RAJ - 1**

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The plaintiffs apologize for any inconvenience this may have caused the Court. The plaintiffs intend to fully prosecute this case.

DATED THIS 9th day of March, 2016.

s/ Noelle E. Dwarzski
Noelle E. Dwarzski, WSBA # 40041
McKENZIE ROTHWELL BARLOW
& COUGHRAN, P.S.
Attorneys for Plaintiff Trusts
1325 Fourth Ave., Suite 910
Seattle, WA 98101

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on this 9th day of March, 2016 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to all parties registered with CM/ECF in this matter. Defendant Kelaye Concrete, LLC has not yet appeared in the suit.

Dated this 9th day of March, 2016, at Seattle, Washington.

/s/ Noelle E. Dwarzski
Noelle E. Dwarzski WSBA No. 40041
McKENZIE ROTHWELL BARLOW
& COUGHRAN, P.S.
Attorneys for Plaintiffs

**RESPONSE TO ORDER TO SHOW CAUSE –
Cause No. 2:15-cv-01866-RAJ - 2**

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